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March 25, 2021

VIA ECF

Honorable Robert M. Levy, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
New York, NY 10007

Re: Marine et al v. Quisqueya Restaurant I Inc. et al.; 20-cv-04671

Your Honor:

This firm represents Plaintiffs in the above-referenced action. We write pursuant to the Court's Order of March 18, 2021 to advise the Court of why the Plaintiff has not yet filed for entry of default.

While Plaintiff had originally intended to move for entry of default, the undersigned was recently contacted by agents of Quisqueya Restaurant I Inc., against whom the original complaint was filed. They provided credible information that this corporate entity is unrelated to the subject restaurant. On the basis of this information, Plaintiffs filed an Amended Complaint removing Quisqueya Restaurant I Inc. and replacing it with the correct corporate entity, Vieja Quisqueya Restaurant Corp. (See Docket No. 21.) The individual defendants remain the same. Should the defendants fail to timely answer the Amended Complaint, Plaintiffs intend to move for entry of default at that time.

We thank the Court for its time and attention.

Respectfully Submitted,

/s/ Clela A. Errington, Esq.
Michael Faillace & Associates, P. C.
Attorneys for Plaintiffs